

**Subject:** Re: CPRA request (CD13.2019.03.12.a)

**From:** [REDACTED]

**Date:** 4/3/19, 4:03 PM

**To:** "Dan Halden" <Daniel.Halden@lacity.org>

Hi Dan,

Section 6255(a) of the CPRA, which you are invoking here, requires the City of Los Angeles to weigh the public interest in producing the records against the public interest in withholding them. If the City is going to withhold records on this basis, it's not enough that the public interest in doing so outweigh the public interest in releasing, but it must **\*clearly\*** outweigh it.

The only public interest you assert in favor of withholding is the amount of work it will take CD13 to redact "over 600 documents." You do not mention the public interest in redacting and producing against which you weighed the interest in saving City staff the labor involved, but I submit to you that it's actually impossible that it is outweighed, let alone clearly outweighed.

Just for instance, you released a few emails between you and Officer Guerra recently. These were the subject of an article on L.A. Taco, one of the City's premiere news sites. The emails were also the subject of discussion, both public and private, among a wide range of advocacy groups and their members, many of whom will be pleased to submit declarations under oath stating their conceptions of the public interest involved in reading Guerra's correspondence with you. The public interest in reading the rest of Officer Guerra's emails not only outweighs the labor that would be expended to redact these records, but it **\*provably\*** outweighs it.

Furthermore, even leaving aside the public interest weighing, your claim is pretty dubious given the requests that CD13 fulfills without protest. For instance, you agreed to produce about 340 pages on the Echo Park BID. Now, I don't know how many pages there are per email since emails don't have an objective pagination but, but it's a lot. Also, you cheerfully "compiled 600+ documents for" various emails about Cherokee and ficus and so on with nary a mention of section 6255(a). You didn't even mention public interest, although the public interest there is high as well.

Given these considerations, I hope you will reconsider your ultimately indefensible 6255(a) claim. I hope also that, in the interest of avoiding yet another costly, time-consuming, and anxiogenic writ petition, you will make some suggestions for overcoming whatever the remaining practical obstacles in my gaining access to these records so that maybe we can come to some kind of agreement. If I don't hear from you about this by Friday, April 12, I will proceed as if you're not planning to reconsider.

Thanks!

[REDACTED]

On Wed, Apr 3, 2019, at 3:00 PM, Dan Halden wrote:

Good afternoon [REDACTED]

An initial search for materials matching your request has yielded well over 600 documents. These documents will be exceptionally